

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

Michael Carrabes,

Plaintiff,

v.

Expeditors International of  
Washington, Inc.,

Defendant.

No. 1:24-CV-12142-AK

**PLAINTIFF'S MOTION TO ADD THE ISSUE OF THREATS MADE BY BRIAN  
CARRABES TO THE AGENDA FOR THE SCHEDULING CONFERENCE**

Plaintiff, Michael Carrabes, by and through his counsel, respectfully moves this Honorable Court to include in the agenda for the upcoming scheduling conference, currently scheduled for March 5, 2025, the matter of severe threats made by Brian Carrabes, identified as a central figure in this litigation, against the Plaintiff and Christina Boudreau, who has a related case pending before this Court (1:25-cv-10300). These threats, made on November 3, 2024, are directly related to the ongoing legal proceedings and have resulted in significant emotional distress to the Plaintiff and others.

**Background of the Threats:**

On the evening of November 3, 2024, at La Fina Restaurant located in Andover, Massachusetts, Brian Carrabes confronted Ally Carrabes, his daughter and the niece of the Plaintiff, while she was dining. (Aff. Michael Carrabes ¶¶ 5,7) Brian Carrabes, in a loud and threatening manner, stated his intention to "slice [the Plaintiff's] throat and Christina Boudreau's throat" and to "watch [them] bleed out." (Id. at ¶ 7) He then attempted to coerce Ally into texting these threats to the Plaintiff, which she refused to do. (Id.)

This incident has left Ally Carrabes traumatized, instilling significant fear for personal safety among the Plaintiff and his family members. (Id. at ¶¶ 6, 9) During the event, Brian Carrabes reportedly expressed to Ally his expectation of being "on the news" and "going to jail" for his actions, further escalating the distress experienced by those involved. (Id. at ¶ 8)

**Legal Relevance and Urgency:**

The Defendant has previously requested this Court to consider issues related to anonymous e-mails, unauthorized recordings, and alleged harassment at the next scheduling conference. The Plaintiff asserts that the threats made by Brian Carrabes are of paramount importance due to their direct

threat to personal safety and the psychological impact on the parties involved, particularly given that this incident involves Christina Boudreau, who has a related case against the Defendant involving Brian Carrabes pending before this court (1:25-cv-10300). These threats not only pertain to the well-being of those in this litigation but also to the integrity of the judicial process itself.

**Request:**

Therefore, Plaintiff respectfully requests that this Court:

1. Add the issue of threats made by Brian Carrabes on November 3, 2024, to the agenda for the upcoming scheduling conference.
2. Consider measures necessary to ensure the safety of the Plaintiff, Christina Boudreau, and other individuals potentially at risk due to these threats.

Plaintiff believes that addressing this issue promptly will serve the interests of justice by providing an immediate forum to discuss and implement protective measures for those involved in this litigation.

### **LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), I hereby certify that I have conferred with counsel for the Defendant, Matthew Lynch, by email in a good faith attempt to resolve or narrow the issues raised in Plaintiff's motion.

Respectfully submitted,  
For and on behalf of the Plaintiff,

/s/ Adam Clermont  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on this 14<sup>th</sup> day of February 2025, a true copy of the foregoing document was filed electronically through the Court's CM/ECF system, is available for viewing and downloading from the ECF system, will be sent electronically to counsel of record as registered participants identified on the Notice of Electronic Filing and via first class mail to all non-registered participants identified on the Notice of Electronic Filing.

/s/ Adam Clermont  
Adam Clermont